

**Federal Defenders
OF NEW YORK, INC.**

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MEMO ENDORSED

April 21, 2022

BY ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York

USDC SDNY
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**Re: United States v. Miguel Hoban
14 Cr. 408 (VEC)**

Dear Judge Caproni,

I write on behalf of Miguel Hoban to request modifications of the terms of his supervised release.

Mr. Hoban completed his prison sentence and began supervised release in January 2022. For the first year of supervised release, the Court ordered Mr. Hoban to comply with a curfew enforced via an electronic (location) monitoring bracelet.

Since January 2022, it is my understanding that Mr. Hoban has been compliant with the terms of his supervision, including the curfew. He recently obtained a commercial driver's license permit and has a job offer with a trucking company. The job would involve driving Monday through Friday (sometimes into Saturday morning) making deliveries throughout the east coast. Initially, Mr. Hoban would train with a licensed commercial driver. Hopefully, after a training period, he would then graduate to driving routes on his own. I understand that Mr. Hoban's Probation Officer has verified this job opportunity with the trucking company and that the company can provide documents to verify the routes Mr. Hoban works. Mr. Hoban is enthusiastic about this job opportunity.

For him to start this job, we request that the Court modify the terms of Mr. Hoban's supervised release to remove his curfew. We also request that Mr. Hoban be permitted to travel outside of New York for purposes of work. Finally, Mr. Hoban also requests that his electronic monitoring bracelet be removed.

I have conferred with AUSA Camille Fletcher and Probation Officer Darren Riley on behalf of the government, and I understand that they both take the same

position on this request: Based on Mr. Hoban's compliance to date, Probation and the government support permitting him to take this job and removing his curfew and location monitoring condition. However, the Probation Office notes that if the Court wishes Mr. Hoban to be able to start this job, but remain on some form of electronic/ location monitoring, that would be possible if his current location monitoring device was changed.

Thank you for consideration of this request.

Respectfully submitted,

/s/ Sarah Baumgartel
Sarah Baumgartel, Esq.
Assistant Federal Defender

cc: AUSA Camille Fletcher (by ECF)

Application GRANTED.

SO ORDERED.



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE